

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

JAMES “JIM” CORNETTE, individually

Plaintiff,

v.

CASE NO. 3:19-cv-00219

**BRANDON GRAVER, individually,
WILLIAM J. MOLNAR, JR., individually,
and d/b/a THE INDY CONNECTION,
THE INDY CONNECTION, INC.,**

Defendants.

PRE-HEARING JOINT STIPULATION REGARDING LANGUAGE

AND NOW comes the Parties, by and through their undersigned counsel, and file the following Joint Stipulation regarding Language to be used at the upcoming Temporary Restraining Order hearing:

1. The Parties recognize and acknowledge that the merchandise at issue in this case and the language by the Parties in this matter contains curse words which are inappropriate to state repetitively in Court.

2. Out of respect for this Honorable Court and the judicial process, the Parties agree jointly to the following short-hand and/or abbreviations in reference to the following words:

- a. The word “FUCK” and all iterations of it shall be denoted by “F” or “The F Word”;
- b. The word “BITCH” and all iterations of it shall be denoted by “B” or “The B Word”;
- c. The word “PUSSY” and all iterations of it shall be denoted by “P” or “The P Word”;

3. To the extent that any other curse words should be brought up during the Temporary Restraining Order hearing in this matter, the Parties agree to use all efforts to abbreviate the curse word using the first letter of the word, or to abbreviate the word in a manner that is clear to the Parties and clear on the record.

4. Notwithstanding the foregoing, neither Party waives or wishes to in any way diminish or take away from any claim or defense they may assert in this matter by use of the stipulated abbreviated language used to improve the courtroom decorum and as a sign of respect to this Honorable Court.

STIPULATED AND AGREED TO BY THE PARTIES:

**DEFENDANTS
BY COUNSEL,**

//s// Max Petrunya
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**PLAINTIFF
BY COUNSEL,**

//s// Stephen P. New
Stephen P. New, Esquire (WVSB# 7756)
(Admitted *Pro Hac Vice*)
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AND NOW, this 21st
day of May, 2020.
IT IS SO ORDERED. Kim R. Nelson
UNITED STATES DISTRICT JUDGE